

REMARKS

I. INTRODUCTION

In response to the Office Action dated February 27, 2003, no claims have been cancelled, amended or added. Claims 1 and 3-35 remain in the application. Re-examination and reconsideration of the application is requested.

II. PRIOR ART REJECTIONS

A. The Office Action Rejections

In paragraphs (3)-(4) of the Office Action, claims 1, 3, 5-11, 21, 23-25, and 35 were rejected under 35 U.S.C. §103(a) as being unpatentable over Du et al., U.S. Patent No. 5,412,806 (Du). In paragraph (5) of the Office Action, claims 4 and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Du in view of Melchione, U.S. Patent No. 5,930,764 (Melchione). In paragraph (6) of the Office Action, claims 12-20 and 26-34 were rejected under 35 U.S.C. §103(a) as being unpatentable over Du in view of Buchanan, U.S. Patent No. 5,758,355 (Buchanan). In paragraph (7) of the Office Action, claims 1, 3, 5, 6, 8-21, and 23-35 were rejected under 35 U.S.C. §103(a) as being unpatentable over Buchanan. In paragraph (8) of the Office Action, claims 4 and 22 were rejected under 35 U.S.C. §103(a) over Buchanan in view of Melchione. In paragraph (9) of the Office Action, claim 7 was rejected under 35 U.S.C. §103(a) as being unpatentable over Buchanan in view of Melchione. In paragraph (9) of the Office Action, claim 7 was rejected under 35 U.S.C. §103(a) as being unpatentable over Buchanan in view of Du.

Applicant's attorney respectfully traverses these rejections.

B. The Applicant's Claimed Invention

Independent claim 1 is generally directed to a network connecting a plurality of self-service machines (SSMs), wherein each of the SSMs executes a relational database management system (RDBMS) that maintains a relational database stored on the SSM, and the relational database stores information for customers that frequent the SSM.

Independent claim 21 is generally directed to a method of processing information in a network interconnecting a plurality of self-service machines (SSMs). A relational database management system (RDBMS) is executed on each of the SSMs, wherein the RDBMS maintains a relational database stored on the SSM and the relational database stores information for customers that frequent the SSM that executes the RDBMS. The information stored in the relational database is used to more effectively serve a customer at the SSM.



Independent claim 35 is generally directed to a relational database management system (RDBMS) executed by a plurality of self-service machines (SSMs) interconnected by a network, wherein each of the SSMs stores a relational database, and the relational database stores information for customers that frequent the SSM.

C. The Du Reference

Du describes a programmable machine system and method for managing electronic data access among multiple different relational databases in a network distributed database environment. The machine is programmed so that it can construct cost-effective access strategies for any of the participating databases absent any DBMS-specific cost models. The system provides query optimization across different database management systems in a network distributed database environment based on a calibrating database relying only on typical relational database statistics and cost data is developed by running queries in the various databases against the calibrating database. A logical cost model is constructed using the resulting cost data and is used to estimate the cost of a given query based on logical characteristics of the DBMS, the relations, and the query itself. The cost of a complex query is estimated using primitive queries. Optimal query access strategies are thereby designed and used to control execution of the queries across relational databases controlled by two or more different database management systems.

D. The Melchione Reference

Melchione describes a sales process support system and method for identifying sales targets using a centralized database to improve marketing success. The system includes a central database that receives comprehensive information from a variety of internal and external feeds, and standardizes and households the information in a three-level hierarchy (households, customers, and accounts) for use by a financial institution. The comprehensive information stored on the central database is accessed through micromarketing workstations to generate lists of sales leads for marketing campaigns. A database engine is provided for generating logical access paths for accessing data on the central database to increase speed and efficiency of the central database. The system distributes sales leads electronically to branch networks, where the sales leads are used to target customers for marketing campaigns. The central database is accessed by workstations of a central customer information system for profiling customers, enhancing customer relationships with the financial institution, and electronically tracking sales and service performance during marketing

campaigns. The system can also include a system for opening an account in a single session that is in communication with the central database, micromarketing centers, central customer information systems and branch systems of the present invention so that data can pass between these systems where legal and appropriate.

E. The Buchanan Reference

Buchanan describes a storage medium encoded for use in synchronization of a server database, which includes a plurality of tables and which is accessible on a server computer system, and a client database, which is accessible on a client computer system and which includes a subset of the tables in the server database, the storage medium comprising a first distribution point table in the server database which has the property that modification of such first distribution point table may influence distribution of information from the server database to the client database during a synchronization of the server database and the client database; a first distribution table which corresponds to the first distribution point table which is separate from the server database application tables and which includes identification information that identifies occurrences of information within the server database that may require distribution to the client database during a synchronization of the server database and the client database; and a first extract program which references the identification information in the first distribution table and corresponding information in the first distribution point table to identify information in the first distribution point table to be distributed to the client database during a synchronization of the server database and the client database.

F. Applicant's Claims Are Patentable Over The Reference

Applicant's claims are patentable over the references because they recite a novel and nonobvious combination of limitations. More specifically, the cited references do not teach or suggest the limitations of independent claims 1, 21 and 35 directed to a network connecting a plurality of self-service machines (SSMs), wherein each of the SSMs executes a relational database management system (RDBMS) that maintains a relational database stored on the SSM and the relational database stores information for customers that frequent the SSM. In addition, the cited references do not teach or suggest the limitations of independent claim 21 directed to using the information stored in the relational database to more effectively serve a customer at the SSM.



The Office Action states that Du teaches most of the limitations of the independent claims. However, the Office Action admits that Du does not teach the limitation "each of the relational databases stores information for those customers that frequent the SSM." Nonetheless, the Office Action states that it would have been obvious in view of Du to accomplish this limitation.

The Office Action also states that Buchanan teaches most of the limitations of the independent claims. However, as with Du, the Office Action admits that Buchanan does not teach the limitation "each of the relational databases stores information for those customers that frequent the SSM." Nonetheless, the Office Action states that it would have been obvious in view of Buchanan to accomplish this limitation.

Applicant's attorney disagrees with these assertions. Specifically, Applicant's attorney submits that these assertions made by the Office Action ignore specific limitations of the claims.

For example, claims 1, 21 and 35 all recite that each of the self-service machines (SSMs) executes a relational database management system (RDBMS) that maintains a relational database stored on the self-service machine. Du merely describes databases stored and accessed on database machine systems (i.e., servers) and Buchanan merely describes databases stored and accessed on servers and clients. Neither reference describes self-service machines, as that term is defined in this application, or relational database management systems executed by self-service machines, or relational databases stored on self-service machines.

In another example, claims 1, 21 and 35 all recite that the relational database of the self-service machine stores information for customers that frequent the self-service machine. As noted above, the Office Action admits that neither Du nor Buchanan describe storing information for customers that frequent self-service machines in the relational databases stored on the self-service machines. Nonetheless, the Office Action asserts that these limitations are obvious in view of Du and/or Buchanan.

The assertion by the Office Action that because Du stores local customer records in a local database system it renders this limitation obvious is not persuasive. Storing local customer records on a local database is simply not the same as executing a relational database management system and maintaining a relational database on each of a plurality of self-service machines, wherein the relational database stores information for customers that frequent the self-service machines. Nothing in Du describes customers accessing self-service machines, or self-service machines executing relational database management systems, or self-service machines maintaining a relational database, or self-service machines storing information for the customers that frequent the self-service machines in the

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relational databases stored on those self-service machines. Only by hindsight can the Office Action maintain this rejection.

Similarly, the assertion by the Office Action that the capability in Buchanan for each client database to store a portion of the server database "appropriate to that client," renders this limitation obvious is not persuasive. There is no teaching or suggestion in Buchanan that describes such a portion as including information for customers that frequent a self-service machine. Indeed, there is no teaching or suggestion in Buchanan that describes clients as self-service machines, or customers accessing self-service machines, or self-service machines executing relational database management systems, or self-service machines maintaining a relational database, or self-service machines storing information for the customers that frequent the self-service machines in the relational databases stored on those self-service machines. Again, only by hindsight can the Office Action maintain this rejection.

As a result, neither Du nor Buchanan render the independent claims obvious.

Melchione fails to overcome the deficiencies in Du and Buchanan. Recall that Melchione was only cited against the dependent claims, and only on the basis that it taught a central database that stores information about all customers and products in the financial institution.

Thus, Applicant's attorney submits that independent claims 1, 21 and 35 are allowable over the cited references. Applicant's attorney also submits that dependent claims 3-20 and 22-34 are submitted to be allowable over the cited references in the same manner, because they are dependent on independent claims 1 and 21, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 3-20 and 22-34 recite additional novel elements not shown by the cited references.

IV. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.

Date: May 27, 2003

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Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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